

From: [Edwin Quinones](#)
To: [Raji Josiam](#); [Cynthia Brown](#)
Subject: Re: US Oil Recovery Site in Pasadena, Texas - Follow up
Date: 07/16/2012 01:06 PM

Hi Cindy and Raji,

EPA can do all the work, including RI/FS and remedial design without the site being listed, assuming available funds, but cannot do the remedial action itself. A PRP can do everything, including the RA, without it being listed. But listing allows the site to follow a prescribed process under CERCLA and the NCP, theoretically keeping the site on schedule for an eventual cleanup, including performance of a fund-lead or PRP-lead RA.

▼ [Raji Josiam](#)

----- Original Message -----

From: Raji Josiam
Sent: 07/16/2012 12:51 PM CDT
To: Cynthia Brown
Cc: Edwin Quinones
Subject: RE: US Oil Recovery Site in Pasadena, Texas - Follow up

Cindy

My understanding is that we have a plan in place however we can't do remedial work (RI/FS, RD-RA etc.) under CERCLA until it is listed or we have alternative approach agreement in place. Copying Ed on this email since he can correct me if I am wrong.

Raji Josiam
Remedial Project Manager
USEPA Region 6
1445 Ross Ave, Ste 1200, 6SF-RA
Dallas, TX 75202

Off: 214-665-8529
Email: josiam.raji@epa.gov

▼ [Cynthia Brown---07/16/2012 09:46:14 AM---Raji, a few weeks ago Lydia asked me to start work on a time line for the remedial work for this si](#)

From: Cynthia Brown/R6/USEPA/US
To: Raji Josiam/R6/USEPA/US@EPA
Date: 07/16/2012 09:46 AM
Subject: RE: US Oil Recovery Site in Pasadena, Texas - Follow up

Raji, a few weeks ago Lydia asked me to start work on a time line for the remedial work for this site. Of course I would need alot of input from you and also Ed. But if I understand this issue (this is the only site I have worked on that went from removal to remedial) we need to wait and see when the site is going to be listed, Is that correct?

Cynthia Brown
Removal Enforcement Coordinator
214-665-7480

▼ Raji Josiam---07/16/2012 09:27:34 AM---I have looked through the letter and the schedule. They will continue with PRP search and removal w

From: Raji Josiam/R6/USEPA/US
To: John Meyer/R6/USEPA/US@EPA, Ben Banipal/R6/USEPA/US@EPA, Brenda Cook/R6/USEPA/US@EPA, Cynthia Brown/R6/USEPA/US@EPA, Edwin Quinones/R6/USEPA/US@EPA, "josiam.raji@epa.gov" <josiam.raji@epa.gov>, Lydia Johnson/R6/USEPA/US@EPA, "meyer.john@epa.gov" <meyer.john@epa.gov>, "peycke.mark@epa.gov" <peycke.mark@epa.gov>
Cc: Carlos Sanchez/R6/USEPA/US@EPA
Date: 07/16/2012 09:27 AM
Subject: RE: US Oil Recovery Site in Pasadena, Texas - Follow up

I have looked through the letter and the schedule. They will continue with PRP search and removal work till end of calendar year 2013. In that case looks like they would like to defer the listing till 2014 (October 2014 if we go once a year?). That is two plus years from now. So if listing is needed to start the actual RI/FS process, that is a long time to even start looking at soil, GW, and surface water issues and extent of contamination.

Raji Josiam
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▼ John Meyer---07/16/2012 06:51:35 AM---So, basically they will do a PRP search and continue on with the removal work. I don't believe this

From: John Meyer/R6/USEPA/US
To: Edwin Quinones/R6/USEPA/US, "meyer.john@epa.gov" <meyer.john@epa.gov>, "josiam.raji@epa.gov" <josiam.raji@epa.gov>, "peycke.mark@epa.gov" <peycke.mark@epa.gov>
Cc: Ben Banipal/R6/USEPA/US, Lydia Johnson/R6/USEPA/US, Cynthia Brown/R6/USEPA/US, Brenda Cook/R6/USEPA/US
Date: 07/16/2012 06:51 AM
Subject: RE: US Oil Recovery Site in Pasadena, Texas - Follow up

So, basically they will do a PRP search and continue on with the removal work. I

don't believe this meets our criteria for stopping the listing.

Sent via iPhone

John C Meyer
Chief, Risk and Site Assessment Section
Superfund Division
EPA Region 6

----- Original Message -----

From : Edwin Quinones/R6/USEPA/US
To : meyer.john@epa.gov, josiam.raji@epa.gov, peycke.mark@epa.gov
Cc :
Sent on : 07/14/2012 11:41:26 AM
Subject : Fw: US Oil Recovery Site in Pasadena, Texas - Follow up

Fyi

From: "Tibbs, Carolyn" [Carolyn.Tibbs@strasburger.com]
Sent: 07/14/2012 12:07 AM GMT
To: Pam Phillips
Cc: "'Koks, Mary'" <mkoks@munsch.com>; Edwin Quinones;
"eengelhart@rossbanks.com" <eengelhart@rossbanks.com>; "Westfall,
Constance" <Connie.Westfall@strasburger.com>; "cbackens@tceq.state.us"
<cbackens@tceq.state.us>; "beth.seaton@tceq.texas.gov"
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"ashley.k.wadick@tceq.texas.gov" <ashley.k.wadick@tceq.texas.gov>
Subject: US Oil Recovery Site in Pasadena, Texas - Follow up

(Sent on behalf of Constance Westfall)

See attached letter and enclosures.

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